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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
11

12	GUILLERMO MEDINA REYES,)	No. 25-cv-05436-RFL
13	Petitioner-Plaintiff,)	
14	v.)	JOINT STATEMENT RE CASE
15	POLLY KAISER, et al.,)	MANAGEMENT
16	Respondents-Defendants)	
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18 Pursuant to the stipulation of the parties, Dkt. No. 29, the parties submit this Joint Statement
19 regarding developments in this matter and a proposed case management schedule.

20 1. As previously reported, on August 12, 2025, the Immigration Court granted the motion of
21 Respondent Department of Homeland Security ("DHS") to schedule a pre-deprivation bond hearing for
22 Petitioner. The bond hearing is scheduled for January 20, 2026.

23 2. On August 28, 2025, DHS filed a motion to advance the pre-deprivation bond hearing.
24 Petitioner, appearing pro se, opposed the motion to allow him additional time to find counsel to
25 represent him at that hearing.

26 3. On September 2, 2025, the Immigration Judge denied DHS's motion to advance the pre-
27 deprivation bond hearing. The next day, DHS filed a motion to reconsider. Petitioner intends to oppose
28 that motion.

4. Two criminal cases against Petitioner remain pending—the case in Santa Clara County for felony vandalism arising from the May 2025 incident and the five-felony count complaint pending in Alameda County Superior Court relating to his July 27, 2025 arrest for attempted car-jacking. Petitioner remains released from Alameda County criminal custody and subject to court-ordered conditions, including GPS electronic monitoring and a mandatory curfew. Since August 6, 2025, he has been in a residential treatment program at Pathway Society in San Jose.

5. The parties respectfully submit that further briefing on Petitioner’s habeas petition should await clarity regarding the pre-deprivation bond hearing to be held in Immigration Court. The parties will submit a further status report no later than October 10, 2025.

6. The parties will continue to meet and confer about Petitioner’s claims and the scope of the preliminary injunction. Respondents reserve the right to submit a request to the Court to modify the preliminary injunction in light of developments in this matter.

DATED: September 5, 2025

Respectfully submitted,

CRAIG H. MISSAKIAN
United States Attorney

/s/ Pamela T. Johann

PAMELA T. JOHANN
Assistant United States Attorney

Attorneys for Respondents-Defendants

DATED: September 5, 2025

PANGAEA LEGAL SERVICES

/s/ Victoria Sun

VICTORIA SUN

Attorneys for Petitioner-Plaintiff

ECF ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I, Pamela T. Johann, attest that I have obtained concurrence in the filing of this document from the other signatory listed here.

/s/ Pamela T. Johann